



230 Main St. #201  
Brattleboro VT 05301

*Telephone*  
(802) 257-0888

*Fax*  
(802) 257-2322

**Website**  
brattleborotv.org

**Board of Directors**  
*President*  
Lynn Barrett

*Vice President*  
Tim Wessel

*Treasurer*  
Martin Langeveld

*Secretary*  
Dora Bouboulis

Joe Bushey  
Beatriz Fantini  
Jerry Goldberg  
Wendy Mason  
Daryl Pillsbury

**Executive Director**  
Cor Trowbridge

**E-mail**  
[cor@brattleborotv.org](mailto:cor@brattleborotv.org)

---

---

---

August 7, 2013

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

Brattleboro Community Television (BCTV) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

BCTV is a 501(c)(3) nonprofit providing Public, Educational and Government (PEG) programming and services. It was established in 1975 to improve government transparency and was the first public access channel in Vermont. Originally serving three towns in Southern Vermont via Comcast Cable, BCTV contracted with Southern Vermont Cable Company in 2011 to serve five additional towns in the greater Brattleboro region. BCTV now carries 1,000 hours of local programming across its two access channels each year to 8,000 plus cable subscribers. Local programs are also made available online via BCTV's website.

While BCTV may be one of the smaller entities submitting comments on this proposed rulemaking, we serve a community that has a high dependency on cable television for news and information. We have limited access to high-speed internet and there is *no* local commercial station serving the Brattleboro area. BCTV is the only local presence on the cable lineup.

In a 2008 survey, 86% of respondents regarded BCTV as important or very important to their community, and 50% of respondents reported watching BCTV daily or weekly.

A critical reason for our interest in this ruling is that Brattleboro is home to the Vermont Center for the Deaf and Hard of Hearing (VCDHH), which includes the Austine School for the Deaf, established in 1901 and serving children, adults and families from pre-kindergarten through 12<sup>th</sup> grade. Austine School alumni and their families often settle in the Brattleboro area, such that the population has a greater than average percentage of residents with auditory disabilities.

To meet the needs of disabled residents, the Brattleboro Selectboard recently voted to include American Sign Language interpretation at all of its regular meetings, which will be part of BCTV's live cablecast. We also carry the daily program "Democracy Now," which includes closed captioning.

Currently there is no way for disabled viewers to know about the accessible programs available to them on our channels. There are no program descriptions and accessibility options on the onscreen video program guide of our multichannel video programming distributors (MVPD), Comcast and Southern Vermont Cable.

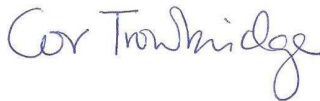
The level of information currently included on the MVPD onscreen video program guide is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers with visual or auditory disabilities are at an even greater disadvantage because they cannot make meaningful video program choices.

Not only do these MVPDs fail to provide a label or symbol indicating that this program has closed captions, they do not carry any programming information whatsoever about our channels. On Comcast, one of our channels is labeled "Local Access Programming," while the other is "P/E/G Access." On Southern Vermont Cable, the channels are labeled "Local Access Programming" in four-hour blocks. Viewers can neither find out what's on, nor can they record a program of their choice unless they are willing to guess what's on and record a four-hour block. 2008 survey respondents overwhelmingly cited lack of available programming information as the number one barrier to watching BCTV.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink that reads "Cor Trowbridge". The signature is written in a cursive, flowing style.

Cor Trowbridge  
Executive Director